



Jason A. Zangara, MPH, MA, FF/NREMT, AIFireE

573 Sidorske Avenue
Manville, NJ 08835
(908) 672-0626
firefighterjazzzyj@yahoo.com

August 11, 2023

VIA HAND DELIVERY

Hon. Robert Kirsch

Clarkson S. Fisher U.S. Court House
402 East State Street
Room 2020
Trenton, NJ 08608

Re: Zangara v. National Board of Medical Examiners
Civil No. 3:22-1559 (RK) (JBD)

Dear Judge Kirsch,

I am reaching out to you to request that the court set a hearing date as specified for pursuant to Rule 65 in regards to my motion for a preliminary Injunction. I am unsure why exactly I was not afford a hearing last time as every other injunction hearing, including the most recent one Defendants were parties to in Sampson v NBME in which they were also represented by Mr. Mandelsberg.

I am experiencing irreparable harm by the day and as you may be aware for some reason my submissions to court have not been taken seriously prior to your assignment to this case. My other concern as briefed and documented through this entire docket is the submissions by NBME and their Attorney. As I have stated to the prior judges, I am not concerned because I am unaware of the rules, I am concerned because it takes only my common sense to see the tactics being employed by Mr. Mandelsberg.

He has been caught multiple times by (1) trying to circumvent prior orders of this court, (2) playing Judge Goodmen and Judge Castener by telling them two different things in hopes they would never find out what he told the other one (3) submitting fraudulent documents to the court since he was unaware that the originals were already on file months before (4) Submitting documents from Defendants that are intended to "explain" test results, but since they were fraudulent, when the tables are actually used by anyone it can be seen clear as day that they were altered

I am not accusing Mr. Mandelsberg of "being mean to me", despite him implying that I can't argue this case because "I haven't done well on his client's exams" or I'm incompetent

because I finished by undergraduate degree online. I could find PLENTY of things to be saying about him personally and respond. But I don't have time to play games with a child. I am making formal accusations against Mr. Mandelsberg for committing fraud upon this court and inhibiting my right to litigate this case.

I have attached two items for your review which are both on file with this court and identified by the stamps across the tops of the documents. One is a copy of a letter I sent to Judges Castner and Goodman when he tried to play them against each other and argue that "this is an accommodations case" (to Judge Castner) and "this is not an accommodations case" (to Judge Goodman). Now as you can see when reading his brief, since he thinks you are unaware of his prior arguments, he's trying to play you also by arguing that "this is an accommodations case" the opposite of what he told Judge Goodman. This among other things as included, caused me to write this detailed letter so the judges can see what he was doing right in front of them. I have attached that letter as "Exhibit A"

The second item I am including is a few pages from my original application for an injunction in which it details how Mr. Mandelsberg in corroboration with his clients are constantly producing fraudulent documents and submitting them to this court. Mr. Mandelsberg has a habit of creating documents and posting them to Defendants website that "*conveniently*" change disputed facts involved in this litigation and are posted "*conveniently*" at the same time he needs to reference them or include them for a motion. I've attached a detailed explanation of this, which was part of my original injunction application as "Exhibit B"

I am convinced that he is going to try and file a frivolous 'sur reply' to get the return date delayed longer from next week for this motion and he's going to attempt to use more fabricated documents in attempts to deceive you and this court in the future.

I therefore request that the motion for my injunction be heard as soon as possible and the court require Defendants to produce Carol Morrison for questioning at the preliminary injunction hearing. If the court finds my submission adequate for the motion to be granted, and only if the motion would be granted then I waive my right to that hearing. If not then this is my official request for a hearing on the record pursuant to Rule 65.

I thank you for taking the time to review my submissions in this matter. Please advise if you have any questions or require any additional information from me. Lastly, thank you for your immediate attention to this matter.

Very truly yours,



Jason A. Zangara, Pro Se
Attorney for Plaintiff

cc: **Perkins Coie via UPS**
1155 Avenue of the Americas
22nd Floor
New York, New York 10036-2711
Attorneys for Defendants